

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:06CR 645 SNL
)	
ROBIN P. RANDLE,)	
)	
Defendant.)	

CRIMINAL INFORMATION

COMES NOW the United States of America, by and through it attorneys Catherine L. Hanaway, United States Attorney for the Eastern District of Missouri, and Michael A. Reilly, Assistant United States Attorney for said District, and in accordance with Title 21, United States Code, Section 851(a), files its criminal information as follows:

1. On October 25, 2006, the federal grand jury returned a single count indictment charging in Count I of the Indictment that on or about October 3, 2006, Defendant Robin P. Randle did knowingly and intentionally possess with the intent to distribute in excess of five hundred grams of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B), which prescribes a term of imprisonment of not less than five years nor more than forty years, a fine of not more than \$2,000,000, and a term of supervised release of not less than four years and not more than life.

2. Defendant previously has been convicted of possession of a controlled substance, a felony drug offense punishable by imprisonment for a term exceeding one year under the laws

of the State of Missouri, in Cause Number 97CR-4775, in the St. Louis County Circuit Court, State of Missouri. Said prior conviction for a felony drug offense has become final.

3. Defendant previously has been convicted of two counts of possession of a controlled substance, cocaine base, and phencyclidine, felony drug offenses punishable by imprisonment for a term exceeding one year under the laws of the State of Missouri, in Cause Number 941-2859 in the St. Louis City Circuit Court, State of Missouri. Said prior conviction for a felony drug offense has become final.

4. Defendant previously has been convicted of possession of a controlled substance, a felony drug offense punishable by imprisonment for a term exceeding one year under the laws of the State of Missouri, in Cause Number 891-2924, in the St. Louis City Circuit Court, State of Missouri. Said prior conviction for a felony drug offense has become final.

5. Having been charged in Count I with knowingly and intentionally possessing with the intent to distribute in excess of five hundred grams of a mixture or substance containing a detectable amount of cocaine, and having been convicted previously of the above mentioned counts of possession of a controlled substance, Defendant, if convicted of Count I, is subject to an enhanced sentence of a term of imprisonment of not less than ten years nor more than life, a fine of not more than \$4,000,000, and a term of supervised release of not less than eight years and not more than life, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii).

6. The Government has previously provided to Defendant a copy of court records reflecting the conduct supporting the above-described prior convictions and will provide copies of the certified convictions prior to the trial in this matter.

WHEREFORE, the United States of America requests that Defendant, upon conviction of

Count I, be sentenced to an enhanced sentence of a term of imprisonment of not less than ten years nor more than life, a fine of not more than \$4,000,000, and a term of supervised release of not less than eight years nor more than life.

Respectfully submitted,

CATHERINE L. HANAWAY
United States Attorney

s/ Michael A. Reilly

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above was served via this Court's electronic mailing system to this 15th day of March, 2007, to:

Mr. Lee Lawless
Federal Public Defender
1010 Market Street, Ste. 200
St. Louis, MO 63101

s/ Michael A. Reilly
MICHAEL A. REILLY, #115988
Assistant United States Attorney